



April 25, 2023

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VIA ECF

Honorable Judge Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Boatman v. RMID, LLC dba Headley Menzies Interior Design et al.*, 1:23-cv-85
Request for Sealing Order

Your Honor:

Our office represents defendants RMID, LLC dba Headley Menzies Interior Design aka Headley Menzies and Keith Headley (collectively “Defendants”) in the above referenced matter. We write jointly with counsel for Plaintiff to request a sealing order in connection with Defendants’ forthcoming motion to dismiss.

As discussed during the April 4, 2023 pre-motion conference, Defendants intend to rely on the November 1, 2019 Settlement Agreement between the parties, which is incorporated by reference in the Complaint at paragraphs 22 and 23. The prior Settlement Agreement contains a confidentiality provision and Plaintiff expressed a desire to maintain confidentiality of the agreement.

Accordingly, the parties request that the Court enter a Sealing Order allowing the parties to file the Settlement Agreement under seal, and to redact any quotations from the agreement that may appear in the parties’ motion papers filed on the public docket.

We thank the Court for its attention to this matter.

Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker LLP

/s/ Stephen Barrett

Stephen J. Barrett

cc: All Parties via ECF

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 21.

Dated: April 25, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE